JACOBS ENGINEERING

May 5, 1995

Transmittal
Tr# 95U005

TO: Mr. Hays Griswald
U.S. EPA Region VIII
999 18th Street, Suite 500
Denver, CO 80202

OPA

FROM: Brian Keating
Project Manager
Jacobs Engineering Group
2530 Arnold Drive
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ON: Contract No. DACA05-92-D-0040, Delivery Order 15
JEG Project No. 21-H103-15 Vernal, Utah - Vernal Naples Truck Stop

ATTACHED ARE	Pol-Rep Report 21	ENCLOSURE	Draft Copy	PRINTS OF EACH WE RELEASE THEM FOR:	
CONSTRUCTION		PURCHASE		APPROVAL	x
FABRICATION		DESIGN		YOUR FILE	X

ENCL NO.	DRAWING OR SPEC NUMBER	REV.	DESCRIPTION	DATE
1.	N/A	0	Draft Pol Rep Report No. 21	5/4

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REMARKS: Please comment.

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U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION REPORT

DRAFT

I. HEADING

DATE:	4/30/95
SUBJECT:	Naples Truck Stop Removal Action, Vernal, UT
FROM:	H. Hays Griswold, OSC Phone: 303-294-7081
TO:	Director, ERD
POLREP No.:	POLREP 21

II. BACKGROUND

SITE No.:	43P808L008
Case No.:	U940169
FPN No.:	114009
D.O. No.:	NA
Response Agency:	EPA Region VIII
Address:	999 18th Street, Suite 500 Denver, CO 80202
Response Authority:	CWA, OPA (1990)
Party Conducting Action:	EPA (PRFA w/USACE)
ERNS No.:	U940169
NPL Status:	NA
State Notification:	State requested EPA action
Action Memorandum Status:	NA
Start Date:	February 22, 1994
Demobilization Date:	NA
Completion Date:	To Be Determined

III. SITE INFORMATION

A. Incident Category

The incident occurred at an a active facility - a Service Station/Truck Stop/Petroleum Bulk Distributor.

B. Site Description

1. Site Description

No change from previous Polreps.

2. Description of Threat

No change.

C. Site Evaluation Results

Results of water quality sampling from existing water mains, performed by Ashley Valley Water and Sewer District (at the request of the State of Utah Division of Drinking Water), indicate BTEX contamination at levels below Federal drinking water standards (MCLs). However, the detectable levels of BTEX have been increasing slightly since a February 13, 1995 sampling event, from one dead-end section of PVC water main within the site. Results of water quality sampling from active portions of nearby surrounding water mains indicates no detectable levels of BTEX contamination.

Results of water effluent (discharge to POTW) continue to indicate levels of VOCs consistently below the discharge limit of 25 ppm for total VOCs. Water analysis was performed for gasoline/BTEX by EPA test methods Mod-8015 and SW8020. These acceptable results have been confirmed over three rounds of sampling over the past two months.

Results of air emission (discharge to atmosphere) indicate unacceptably high levels of total hydrocarbons confirmed over three sampling rounds during the past two months (6,600 ppm from the initial round of sampling, 11,400 ppm from the second round, and 5,000 ppm from the third round). Analysis of air samples was performed using method TO-3 for total volatile hydrocarbons as gasoline and for BTEX. The levels of contamination far exceed the maximum permissible instantaneous limit of 86 ppm, total VOCs, based on a 200 cfm air discharge flow rate. The USACE, Omaha requested IT perform an additional round of air sampling to verify JEG's results. These air samples were collected on 4/28/95, however, final results are not available as yet.

Final, verified results of sampling at the site will be submitted quarterly as an attachment to this Polrep. Preliminary results are available upon request from Jacobs Engineering Group (JEG).

IV. RESPONSE INFORMATION

A. Situation

Date of Notification:	2/08/94
Date of Discovery:	11/01/93
Date Action Started:	2/15/94
Material Involved:	Unleaded Gasoline
Quantity Discharged:	7000 + gallons
Substantial Threat:	Yes
Resource Affected:	Unnamed tributary to Ashley Creek, tributary to Green River
Source Identification:	Naples Truck Stop

1. Removal Actions to Date

Removal of contaminated water and soil vapor continues through operation of the dual-phase groundwater pump-and-bio-treat system. The system has been fully operational, off-and-on, since the March 1, 1995 start date for JEG operation and maintenance activities. Due to inoperationable flowtotalizer during the entire month of April, treatment flow could not be estimated during this month. IT Corporation has ordered a replacement flowtotalizer.

During the month of April, 23 separate shutdowns of the system were recorded on the site shutdown log. The primary cause of these system shutdowns were high-high water levels at the vacuum pump skid units (due to water surges), and high-high water levels in the final effluent tank. Additional float switches have been added to the water holding tanks on the skid units and system start-up operations have been modified to overcome the recurring high water levels at the skid units. The effluent tank high levels have also been corrected through switch modifications, cleaning operations within the effluent tank and bio-mass removal from associated tank piping. It appears, given the frequency of shutdowns, that the system continues to be in a "shake-down" mode of operation at this time. Due to the frequency of response to system shutdowns, JEG's subcontractor, Kleinfelder Inc., has now exceeded the labor hours allotted within the statement of work for responding to such shutdowns for the entire year.

2. Enforcement

No change from previous Polreps.

B. Planned Removal Actions

Continue to operate, maintain and sample from the operating system unless notified otherwise by USACE/EPA.

C. Next Steps

Consideration should be given toward a system re-design and modification to meet air discharge requirements.

D. Key Issues

The treatment system does not appear to be successfully reducing the hydrocarbon levels within the air stream. Consideration needs to be given toward a system re-design and modification to meet air emission requirements. The Ashley Water Valley Water and Sewer District continues to sample from existing water mains. If the treatment system was shutdown for modifications, the District and the State Division of Drinking Water would be concerned about the potential for the spread of BTEX contamination to downgradient, unaffected water mains.

V. COST INFORMATION

Project Ceiling . . . . . $ 1,800,00.00

	Costs to Date	Ceiling
Extramural		
TAT	$ 60,000	$ 70,000
USACE (Omaha)	$ 850,000	$ 1,300,000
USACE (Sacramento)	$ 145,000	$ 290,000
Intramural		
Direct Reimbursable	$ 9,000	$ 30,000
Direct Recoverable	$ 9,000	

The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report is written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

CC:
Rich Haavisto, USACE-Sacramento
Larry Leahy, USACE-Omaha
Brian Keating, JEG
Dan Thompson, IT Corp.

REMOVAL CONTINUES:
H. Hays Griswald, OSC
1500 hrs, April 30, 1995